

Managed Care Operations Memorandum
General Operations
MCOPS Memo # 04/2020-007

Date: April 3, 2020

Subject: Elective Services should not be provided during the COVID-19 emergency disaster

To: All Physical Health (PH) HealthChoices Managed Care Organizations (MCOs) – Statewide

From: Laurie Rock, Director, Bureau of Managed Care Operations

Purpose:

The Office of Medical Assistance Programs (OMAP) is issuing this Operations Memorandum to provide direction regarding the authorization of elective services during the COVID-19 emergency disaster.

Background:

On March 6, 2020, Governor Tom Wolf issued an emergency [disaster declaration](#) in response to the presence of the COVID-19 virus in Pennsylvania. On March 19, 2020, Governor Wolf and Secretary of Health Dr. Rachel Levine signed [executive orders](#) which prohibit elective medical and surgical procedures from being performed in Pennsylvania during the duration of the COVID-19 emergency. Hospitals, Ambulatory Surgical Centers, physicians, dentists and other health care practitioners were prohibited by the order from performing elective procedures until the executive orders are lifted.

Additionally, the [Center for Medicare & Medicaid Services](#) recommended health care providers limit non-essential adult elective surgery and medical and surgical procedures, including dental. The recommendations were to limit the exposure of patients and staff to COVID-19 and to conserve resources such as ventilators and personal protective equipment.

Discussion:

The PH-MCOs must continue to accept and review prior authorization requests for inpatient and outpatient elective procedures, elective interventional radiology and dental procedures. All requests need be reviewed for medical necessity.

The Department has issued guidance to the fee-for-service (FFS) providers. The PH-MCOs must implement the process set forth in the FFS guidance or submit an alternate plan to the department within five (5) business days of the issuance of this Ops Memo.

The FFS guidance is as follows:

- If the service is elective and medically necessary the service will be approved other than requested and the effective date for the elective services will be July 1, 2020.
- The Department will use the following to determine if the procedure is elective: the CMS guidance, the Department of Health's Guidance on Hospitals' Response to COVID-19, the Guidance on Ambulatory Surgical Facilities and the Dental Guidance.
- If a provider believes that the elective procedure is life-sustaining and needed to protect the health of the patient, the requesting provider or facility should indicate this during the authorization phone call or note this on the authorization request form (MA-97 or ADA Dental Claim form). Providers may be asked for documentation to justify the life-sustaining need for the service.
- If a physician reviewer agrees there is a life-sustaining need for the procedure the service will be approved with an immediate or the requested effective date.
- If the emergency disaster declaration ends prior to July 1, 2020, the Department will reissue updated notices of decision to patients and providers with new effective dates.
- If the emergency disaster declaration ends later than July 1, 2020, the Department will reissue updated notices of decision to patients and providers with new effective dates.
- If a patient's condition changes and the elective service is now a life-sustaining need, providers should contact the Department to report the change and determine if a new effective date is necessary.
- Medical Assistance Fee-for-Service claims for services authorized with a future effective date will not pay if the date of service is prior to the effective date on the notice of decision when the service is approved other than requested.

Next Steps:

PH-MCOs will advise the department within five (5) business days of their intentions to implement the guidance issued to the FFS providers, or submit an alternate plan. Should the PH-MCO decide to submit an alternate plan, they must submit their plan within five (5) business days of the issuance of this Ops Memo for review and approval.

Obsolete:

This MC OPS Memo will remain in effect for 90 days or while a valid disaster declaration by the Governor related to COVID-19 remains in effect, whichever is earlier.